

**KRATTENMAKER O'CONNOR & INGBER P.C.**

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March 3, 2021

CHARLES G. KRATTENMAKER, JR.  
MARY WINSTANLEY O'CONNOR  
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OF COUNSEL: RAYMOND SAYEG

**VIA EMAIL DELIVERY**

Honorable M. Page Kelley  
Chief U.S. Magistrate Judge  
Moakley U.S. Courthouse  
1 Courthouse Lane  
Boston, MA 02210

Re: United States v. Faith Newton  
Docket No. 21CR10035

Dear Judge Kelley:

I am in receipt of the Memorandum of Probation Officer Andrew R. Kessler-Cleary dated March 2, 2021 filed in response to the Defendant's Motion For Release. The defense is prepared to address the Memorandum and footnote 6 of the Defendant's Motion as the Court deems suitable at the Zoom hearing scheduled for March 4, 2021 at 2:30 p.m.

In summary, your undersigned defense counsel states that as Ms. Newton's then-attorney of record I was present as counsel for the PTS/US Probation detention interview. The contents of footnote no. 6 of the Defendant's Motion For Release are consistent with counsel's memory of the interview. The footnote also accurately and consistently incorporate counsel's notes taken during the interview of Faith Newton on February 3, 2021, and are also consistent with counsel's decades of experience and practices in dealing with US Probation.

It is indeed the practice of counsel to inform a probation officer that a client will not respond to any questions which directly or indirectly pertain to any allegations in the applicable criminal indictment, and therefore they should not make inquiry into those areas. I also informed PO Kessler-Cleary on February 3, 2021 that in this indictment there were allegations of money laundering including allegations that my client had diverted funds outside the United States so there would be no questions regarding any funds or assets abroad as this could endanger her Fifth Amendment Rights. I understood that US Probation agreed to those limitations and would avoid questions in those areas.

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In almost three decades of federal criminal practice, I have never had any issues, misunderstandings or difficulties with US Probation regarding this practice.

I thank you for your attention to this matter.

Very truly yours,

/s/ Raymond Sayeg

RS/ccl

Cc: Rachel Hemani, United States Attorneys' Office, District of Massachusetts  
Andrew R. Kessler-Cleary, United States Probation  
R. Bradford Bailey, Esq.